

2-Way Memo

Subject: Union Manufacturing Inc. R(83)E006
Chandler, Arizona (Indian Lands)

INSTRUCTIONS

Use routing symbols whenever possible.

SENDER (Originator of message):

Use brief, informal language.

Conserve space.

Forward original and one copy.

RECEIVER (Replier to message):

Reply below the message, keep one copy, return one copy.

To : Phil Bobel T-2
Chief, Toxics & Waste Programs Branch

THRU: Bob Mandel T-3-2
Chief, Field Inspections Section

THRU: Kathleen G. Shimmin T-3
Chief, Compliance & Response Branch

DATE OF MESSAGE

12/29/82

ROUTING SYMBOL

T-3-2

SIGNATURE OF ORIGINATOR

TITLE OF ORIGINATOR

Env. Prot. Specialist

FOLD

MESSAGE

FOLD

Enclosed for your review and action is a RCRA ISS investigation on the subject facility. An extensive list of potential violations is attached. The amount of waste generated by Union Manufacturing may qualify the facility as a small quantity generator. However, I observed evidence of on-site waste disposal in four locations. These potentially contaminated areas should be addressed by the facility before EPA approves the withdrawal of their Part A application. All waste areas are unfenced, and accessible via an unpaved road. A Potential Hazardous Waste Site Preliminary Assessment for Union Manufacturing Inc. will be completed, and transmitted to T-3-1.

Per a discussion with Paul Blais today, this report will be transmitted to the facility when the transmittal format is finalized by T-2.

REPLY

From : Karen O'Regan, T-3-2
Field Investigator
Field Inspections Section
Compliance & Response Branch

DATE OF REPLY

ROUTING SYMBOL

SIGNATURE OF REPLIER

TITLE OF REPLIER

1. RETAINED BY ADDRESSEE

5027-107

OPTIONAL FORM 27 (Rev. 7-81)
GSA FPMR (41 CFR) 101-11.6
NSN 7540-00-082-2447

LIST OF POTENTIAL VIOLATIONS AT UNION MANUFACTURING

- 265.13(a): Owner/Operator has not obtained a detailed chemical and physical analysis of the waste;
- (b): Owner/Operator has not developed a written waste analysis plan.
- 265.14(a): Owner/Operator has not minimized the possibility for unauthorized entry of persons or livestock. Security measures do not include;
- (b): (1) 24 hour surveillance system;
- (2) (i) An artificial or natural barrier around the active portion of the facility;
- (ii) A means to control entry at all times;
- (c): Danger signs at the entrance.
- 265.15 : Owner/Operator has not developed a written inspection schedule or log.
- 265.16(d): Personnel training records do not include:
- (2) Job descriptions;
- (3) Description of training;
- (4) Records of training.
- 265.17(a): Owner/Operator has not posted "No Smoking" signs in paint stripping area or hazardous waste storage area.
- 265.31 : The inspector observed evidence of a release of hazardous waste or hazardous waste constituents to soil at the facility.
- 265.51 : Owner/Operator has not developed and maintained a
265.52 written Contingency Plan at the facility.
265.53
- 265.55 : Owner/Operator has not designated a facility Emergency Coordinator.
- 265.90 : Facility has not implemented a groundwater monitoring system, to determine the impact of the on-site disposal of paint stripping waste on the groundwater.
- 265.112 : Owner/Operator has not developed a written closure plan.

- 265.118 : Owner/Operator has not developed a written post-closure plan.
- 265.142 : Owner/Operator has not provided a cost estimate for facility closure.
- 265.143 : Owner/Operator has not established financial assurance for facility closure.
- 265.144 : Owner/Operator has not provided a cost estimate for post-closure monitoring and maintenance.
- 265.145 : Owner/Operator has not established financial assurance for facility post-closure care.
- 265.147 : Facility cannot demonstrate the liability coverage for sudden accidental occurrences in the amount of at least \$1 million per occurrence with an aggregate of at least \$2 million.
- 265.171 : Containers holding waste are not in good condition (See Photographs 17-20); and owner/operator has not transferred the hazardous waste to a container in good condition.
- 265.173(a): Containers holding waste are stored open (See Photographs 15-20);
- 265.173(b): Containers holding waste are not manage to prevent leaks (See Photographs 17-19).
- 265.174 : Containers are not inspected weekly for leaks or defects.
- 262.21(a)(4): The manifest (Appendix 11) does not contain the complete address and EPA identification number of the designated TSD facility.
- 265.272 : Owner/Operator has not complied with requirements
- 265.273 for a land treatment facility.